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6 Corporation and Randall Letcavage

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8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

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11 SECURITIES AND EXCHANGE  
12 COMMISSION,

13 Plaintiff,

14 v.

15 PREMIER HOLDING  
16 CORPORATION, et al.,

17 Defendant.

18 Case No. 8:18-CV-00813-CJC-KESx

19 **DECLARATION OF MEGAN  
20 BRADSHAW IN SUPPORT OF  
21 PREMIER HOLDING  
22 CORPORATION AND RANDALL  
23 LETCavage'S MOTION TO SET  
24 ASIDE ENTRY OF DEFAULT  
25 PURSUANT TO FED. R. CIV. P.  
26 55(c)**

27 **[Filed concurrently with Motion to  
28 Set Aside Entry of Default,  
Memorandum of Points and  
Authorities, Declarations in Support  
of Motion, (Proposed) Order, Proof of  
Service]**

29 Hearing Date: Monday, March 23, 2020  
30 Hearing Time: 1:30 p.m.  
31 Judge: Hon. Cormac J. Carney  
32 Crtrm.: 7C

33 Complaint Filed: December 4, 2017

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## DECLARATION OF MEGAN BRADSHAW

I, Megan Bradshaw, hereby declare:

1. I am over the age of eighteen (18) years and not a party to this case. The facts contained in this declaration are from my own personal knowledge.
2. I am the office manager of Premier Holding Corporation (“Premier”), and have been since approximately 2015.
3. I am the only full-time employee of Premier, and my duties are primarily clerical and administrative. I am not an officer or director of Premier, and do not have any executive decision-making authority.
4. I am aware that Randall Letcavage, the CEO and director of Premier, fell in the shower on or about July 30, 2019 and sustained a serious head injury. Mr. Letcavage told me that day that as a result of this head injury, he was temporarily paralyzed that day on his left side, and he also complained about having headaches and dizziness, and confusion that day.
5. Over the course of the next several months, from on or about July 30, 2019 until the present, I observed that Mr. Letcavage was not able to consistently take care of the business of Premier as he had in the past. During this time, I observed that he was extremely forgetful at times, confused, and not able to concentrate very well on his business at Premier. He also complained of periodic headaches, confusion, and dizziness during this time period. I also observed him to be occasionally and uncharacteristically irritated and angry during this time period.
6. I am also aware that on July 30, 2019, he was diagnosed by his doctor, Mitchell Wainwright, M.D., as having suffered a traumatic brain injury and a concussion on that

1 day, and am also aware that on February 14, 2020 Dr. Wainwright, diagnosed Mr.  
2 Lertcavage as having traumatic brain injury and Post-Concussion Syndrome.  
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4 7. I have noticed that Mr. Letcavage has, since about mid-January, seemed a bit better,  
5 and is not as frequently exhibiting the symptoms of confusion, forgetfulness, headache,  
6 and confusion that I have witnessed since his head injury in July, 2019.  
7  
8 8. Among my duties as office manager of Premier are collecting and distributing mail  
9 addressed to Mr. Letcavage that comes to Premier's office in Tustin, California. In  
10 taking care of these duties, I do not recall ever receiving any letter or package in the  
11 mail addressed to Mr. Letcavage from Jacob Bach, Esq, containing the Court's  
12 September 30, 2019 order, or forwarding any such letter or package containing this  
13 court order to Mr. Letcavage. I also do not recall ever discussing this court order with  
14 Mr. Letcavage.  
15  
16 9. As a layperson, I am totally unfamiliar with the so-called "PACER" system used to file  
17 and serve federal court court documents, and have never used PACER, and am not an  
18 email recipient on PACER, so I did not and do not have any ability to obtain  
19 information the SEC or other parties in this case filed or served on PACER.  
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24 [SIGNATURE PAGE FOLLOWING]  
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and dated this 18th day of February, 2020, in Los Angeles, CA.

By:   
Megan Bradshaw

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and not a party to this action. I am  
4 employed in the County of Los Angeles, State of California. My business address is 9350  
Wilshire Boulevard, Suite 206, Beverly Hills, CA 90212.

5 On February 21, 2020, I served true copies of the following document(s) described as  
6 **DECLARATION OF MEGAN BRADSHAW IN SUPPORT OF PREMIER HOLDING**  
**CORPORATION AND RANDALL LETCAVAGE'S MOTION TO SET ASIDE**  
**ENTRY OF DEFAULT PURSUANT TO FED. R. CIV. P. 55(c)**

7 on the interested parties in this action as follows:

8 **SEE ATTACHED SERVICE LIST**

9 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the  
10 persons at the addresses listed in the Service List and placed the envelope for collection and  
mailing, following our ordinary business practices. I am readily familiar with the practice of  
11 Bergeson LLP for collecting and processing correspondence for mailing. On the same day that  
correspondence is placed for collection and mailing, it is deposited in the ordinary course of  
12 business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I  
am a resident or employed in the county where the mailing occurred. The envelope was placed in  
13 the mail at Beverly Hills, California.

14 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the  
15 document(s) to be sent from e-mail address abilson@be-law.com to the persons at the e-mail  
addresses listed in the Service List. I did not receive, within a reasonable time after the  
transmission, any electronic message or other indication that the transmission was unsuccessful.

16 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the  
17 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case  
who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case  
18 who are not registered CM/ECF users will be served by mail or by other means permitted by the  
court rules.

19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct and that I am employed in the office of a member of the bar of this  
Court at whose direction the service was made.

21 Executed on February 21, 2020, at Beverly Hills, California.

23 

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24 **/s/ Bilson, Andrew**  
Bilson, Andrew

**SERVICE LIST**  
**SECURITIES AND EXCHANGE COMMISSION v. PREMIER HOLDING**  
**CORPORATION, et al.**  
**Case No. CV 18-00813-CJC(KESx)**

**Bennett Ellenbogen (served by CM/ECF only)**  
**Howard A Fischer (served by CM/ECF only)**  
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and Exchange Commission*